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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

SALEEM KHAN, et al.,

Defendants,

Case No. 3:14-CV-02743-HSG (DMR)

**STIPULATION AND ORDER
SUSPENDING DEADLINES AS TO
DEFENDANT AKBARI**

1 Plaintiff Securities and Exchange Commission (“Commission” or “SEC”) and defendant
2 Ammar Akbari hereby submit the following Stipulation and Proposed Order, and request that the
3 Court continue the suspension of deadlines as to Akbari, as follows:

4 WHEREAS, pursuant to the request by the SEC and Defendant Akbari, the Court entered the
5 stipulated Proposed Order on March 2, 2015, suspending deadlines as to Defendant Akbari for 90
6 days. The stipulation was based upon the estimated time needed for submission to the Commission
7 of the terms of a settlement offer, for its approval or rejection;

8 WHEREAS counsel for the SEC underestimated the amount of time that would be required to
9 present the matter to the Commission for approval or rejection, and now estimates that a further six
10 weeks will be required before the matter can be considered;

11 WHEREAS defendant Akbari will lose much of the value of making a settlement offer if he is
12 nevertheless required to answer the complaint or to participate in the upcoming events, including the
13 Case Management Conference scheduled for June 23, 2015, and the filing of the joint CMC
14 Statement no later than June 16, 2015;

15 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned parties that
16 Defendant Akbari should be relieved of the obligation to meet deadlines in this case for a period of
17 90 days from the date of the filing of this Stipulation. If, within the 90 days, the Commission has
18 considered and either approved or rejected the settlement offer, the SEC and Defendant Akbari will
19 so inform the Court immediately.

IT IS SO STIPULATED:

DATED: June 8, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca, Esq.
SECURITIES AND EXCHANGE
COMMISSION
44 Montgomery Street, Suite 2800
San Francisco, CA 94104
Counsel for the Plaintiff

/s/ William H. Kimball

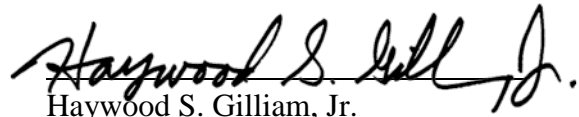
William H. Kimball, Esq.
LAW OFFICES OF WILLIAM H. KIMBALL
803 Hearst Avenue
Berkeley, CA 94710
Counsel for Defendant Ammar Akbari

ORDER

Good cause appearing from the above Stipulation, the requested 90-day suspension of all deadlines as to Defendant Ammar Akbari is hereby GRANTED. IT IS HEREBY ORDERED THAT the Plaintiff Securities and Exchange Commission and Defendant Ammar Akbari will report to the Court no later than 90 days from the date of entry of this Order to inform the Court whether a settlement between them has been approved by both parties.

IT IS SO ORDERED.

DATED: June 9, 2015


Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT JUDGE

ATTESTATION

I, Susan F. LaMarca, am the ECF User whose identification and password are being used to file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their representatives concurs in this filing to the extent indicated.

Dated: June 8, 2015

/s/ Susan F. LaMarca

Susan F. LaMarca

Attorney for Plaintiff

SECURITIES AND EXCHANGE COMMISSION

CERTIFICATE OF SERVICE

I, Janet Bukowski, am a citizen of the United States, over 18 years of age and not a party to this action. On June 9, 2015, I served the following documents:

♦ **STIPULATION AND PROPOSED ORDER SUSPENDING DEADLINES AS TO
DEFENDANT AKBARI**

via e-mail and U.S. Mail, postage pre-paid, to the following:

Roshanlal Chaganlal
4883 Thornpike Lane
Dublin, CA 94568
rchaganlal@gmail.com

The following defendants were served via the Court's CM/ECF system:

William H. Kimball, Esq.
Law Offices of William H. Kimball
803 Hearst Avenue
Berkeley, CA 94710
Attorney for Defendant Ammar Akbari

Christopher Cannon, Esq.
Sugarman & Cannon
180 Montgomery Street, Suite 2350
San Francisco, CA 94104
Attorney for Defendant Saleem Khan

Charlene S. Shimada, Esq.
Morgan, Lewis & Bockius LLP
Three Embarcadero Center
San Francisco, CA 94111-4067
Attorney for Defendant Ranjan Mendonsa

I declare under penalty of perjury that the statements made above are true and correct.

Executed in San Francisco, California June 9, 2015.

/s/ Janet Bukowski

Janet Bukowski, Paralegal Specialist
SECURITIES AND EXCHANGE COMMISSION